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Attorneys for Plaintiff  
JOHN DOE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JOHN DOE,

Plaintiff,

v.

COUNTY OF SOLANO, et al.,

Defendants.

Case No. 2:23-cv-00180-AC

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING TRIAL AND  
ATTENDANT DEADLINES**

Pursuant to Federal Rules of Civil Procedure 16(b)(4) and Eastern District of California Local Rules 143, plaintiff John Doe (“Plaintiff”) and defendants County of Solano, Armando Espinoza, Stephanie Bachman, Jose Naranjo, Aaron Neisingh, Anthony Posadas, and Scott Smyth (collectively, “Defendants”) (all parties, collectively, the “Parties”) stipulate as follows:

1. Plaintiff filed his complaint against defendants County of Solano, Armando Espinoza and Stephanie Bachman (originally “Stephanie M. Garcia”) on December 28, 2022 in the Superior Court of the State of California, County of Solano. Dkt. No. 1, Ex. A. The complaint included doe defendants.

2. Defendants removed the action to this Court on January 30, 2023. Dkt. No. 1.

3. The Court entered a scheduling order on June 23, 2023. Dkt. No. 15.

Stipulation and [Proposed] Continuing Trial and Attendant Dates

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4. After discovery aimed at identifying doe defendants, by stipulation and with the Court's permission, Plaintiff filed a first amended complaint on January 3, 2024. Dkt. No. 28.

5. In recent months, Plaintiff's counsel has been retained by additional alleged victims of sexual assault perpetrated Solano County Jail inmate Kurt Alan DaSilva, the same person who Plaintiff alleges sexually assaulted him in the Solano County Jail.

6. The Parties believe it is prudent and in the interest of economy to continue the trial date and all attendant deadlines by approximately seven months. Such a continuance would allow the parties to prepare for and attend a global mediation that could potentially resolve all claims of alleged victims of sexual assault perpetrated by Solano County Jail inmate Kurt Alan DaSilva who are represented by Plaintiff's counsel.

7. The Parties propose the following continued schedule:

Event	Date
Discovery Completed	October 25, 2024
Motions to Compel Heard Not Later Than	October 9, 2024
Initial Expert Disclosures	December 18, 2024
Rebuttal Expert Disclosures	January 28, 2025
All Non-Discovery Law and Motion	December 11, 2024
Final Pretrial Conference	April 9, 2025
Jury Trial	May 12, 2025

It is so stipulated.

Dated: March 4, 2024

EMANUEL LAW GROUP

By: /s/ Pamela E. Glazner  
Pamela E. Glazner  
Attorneys for Plaintiff JOHN DOE

1 Dated: March 4, 2024

HAWKINS PARNELL & YOUNG, LLP

2 By: /s/ Danielle K. Lewis (authorized on 3/4/2024)

3 Danielle K. Lewis

4 Attorneys for Defendants COUNTY OF

SOLANO, ARMANDO ESPINOZA and

5 STEPHANIE BACHMAN, JOSE NARANJO,

AARON NEISINGH, ANTHONY POSADAS,

6 and SCOTT SMYTH

7 **[PROPOSED] ORDER**

8 The Court, having reviewed the foregoing Stipulation, and good cause appearing therefor, here  
9 by orders as follows:

10 1. All discovery shall be completed by October 25, 2024. Motions to compel must be  
11 heard no later than October 9, 2024.

12 2. Initial expert disclosures shall be made on or before December 18, 2024; rebuttal expert  
13 disclosures on or before January 28, 2025.

14 3. All law and motion, except as to discovery, shall be completed as described in the  
15 Court's original June 23, 2023 Pretrial Scheduling Order (Dkt. No. 15.) on or before December 11,  
16 2024.


17 4. The final pretrial conference is set before the undersigned on April 9, 2025, at 10 a.m.  
18 in Courtroom No. 26, 8th Floor. Pretrial statements shall be filed in accordance with Local Rules 281  
19 and 282, and the requirements set forth in the Court's original June 23, 2023 Pretrial Scheduling Order  
20 (Dkt. No. 15.).

21 5. A jury trial is set to commence before the undersigned on May 12, 2025, at 9:00 a.m. in  
22 Courtroom No. 26, 8th Floor.

23 6. Failure to comply with the terms of this order may result in the imposition of monetary  
24 and all other sanctions within the power of the court, including dismissal or an order of judgment.

25 IT IS SO ORDERED.

26 DATED: March 4, 2024

27   
28 ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE